

Amy M. Samberg (NV Bar No. 10212)
 FORAN GLENNON PALANDECH PONZI & RUDLOFF PC
 One Arizona Center
 400 East Van Buren Street, Suite 550
 Phoenix, Arizona 85004
 Telephone: (602) 777-6230
 Facsimile: (312) 863-5099
 E-Mail: asamberg@fgppr.com

Lee H. Gorlin (NV Bar No. 13879)
 FORAN GLENNON PALANDECH PONZI & RUDLOFF PC
 2200 Paseo Verde Parkway, Suite 280
 Henderson, NV 89052
 Telephone: 702-827-1510
 Facsimile: 312-863-5099
 E-mail: lgorlin@fgppr.com

*Attorneys for Plaintiff National Union Fire
 Insurance Company of Pittsburgh, PA*

**UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEVADA**

NATIONAL UNION FIRE INSURANCE
 COMPANY OF PITTSBURGH, PA, a
 foreign corporation,

Plaintiffs,

v.

GRANT, MORRIS, DODD, PLLC, a Nevada
 Professional Corporation, STEVEN L.
 MORRIS, LTD, a Nevada Corporation,
 STEVEN L. MORRIS, a Nevada Resident,
 and JSD PROPERTIES, LLC, a Nevada
 Limited Liability Company.

Defendants.

No. 2:20-cv-01310-KJD-DJA

**STIPULATION AND ORDER
 EXTENDING THE TIME FOR
 PLAINTIFF TO RESPOND TO GRANT
 MORRIS DODDS PLLC's MOTION TO
 DISMISS OR, IN THE ALTERNATIVE,
 STAY THIS DECLARATORY
 JUDGMENT ACTION (ECF Nos. 12/13)**

IT IS HEREBY STIPULATED AND AGREED by Plaintiff National Union Fire Insurance
 Company of Pittsburgh, PA ("National Union") and Defendant Grant Morris Dodd, PLLC
 ("GMD"), by and through their respective counsel, that the time for National Union to file and
 serve its Response to GMD's Motion to Dismiss or, in the Alternative Stay this Declaratory
 Judgment Action (ECF Nos. 12 and 13) be extended by seven (7) days through and including
 September 21, 2020.

Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and Local Rule IA 6-1(a), National Union represents that points and authorities presented in GMD's Motion require additional time to review and to present adequate and thorough counter-argument and supporting authorities. Further, with the necessities of working remotely due the ongoing COVID-19 pandemic additional time is required for counsel to prepare its Response and to obtain client review and approval of the Response.

Accordingly, the National Union and GMD hereby agree and stipulate to allow National Union until September 21, 2020 to file its Response to GMD's Motion. Further, the parties respectfully request this honorable Court enter an Order providing the same.

DATED: September 3, 2020

DATED: September 3, 2020

SANTORO WHITMIRE

FORAN GLENNON PALANDECH PONZI
& RUDLOFF PC

By: /s/ James E. Whitmire
James E. Whitmire Esq.
10100 W. Charleston Boulevard, Suite 250
Las Vegas, NV 89135

By: /s/ Amy M. Samberg
Amy M. Samberg, Esq.
400 E. Van Buren Street, Suite 550
Phoenix, AZ 85004

*Attorney for Defendant Grant Morris
Dodds, PLLC*

Lee H. Gorlin, Esq.
2200 Paseo Verde Parkway, Suite 280
Henderson, NV 89052

*Attorneys for Plaintiff National Union Fire
Insurance Company of Pittsburgh, PA*

IT IS SO ORDERED:



UNITED STATES. DISTRICT JUDGE

DATED: September 4, 2020.